

EXHIBIT 14

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804  
Judge Dan Aaron  
Polster

This document relates to:

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.  
Case No. 17-OP-45004

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al  
Case No. 18-OP-45132

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Videotaped deposition of
BRIAN NELSEN
30(b)(6)

January 24, 2019
9:08 a.m.

Taken at:
Jackson Kelly
50 South Main Street, Suite 201
Akron, Ohio

Renee L. Pellegrino, RPR, CLR

<p style="text-align: right;">Page 154</p> <p>1 A. Let me think about that for a 2 minute.</p> <p>3 MR. PENDELL: And I'm just objecting 4 to the form and scope, but you can go ahead.</p> <p>5 A. You know, I am aware of some people 6 -- I don't know that I'm going to say they ended 7 up in the criminal justice system, but who 8 either ended up in the hospital, or another 9 gentleman I'm thinking actually lost a licensure 10 because of a situation like that. And I'm 11 certainly not going to go into any detail on 12 those cases or who those people are.</p> <p>13 Q. But my question was specific. Can 14 you point to anybody who used prescription 15 opioids, became addicted to opioids, then used 16 illicit or unlawful opioids and then entered the 17 criminal justice system, that is they were 18 charged with and prosecuted for a drug crime 19 involving opioids?</p> <p>20 MR. PENDELL: Objection.</p> <p>21 Q. Can you point to anyone?</p> <p>22 MR. PENDELL: Objection. Form and 23 scope.</p> <p>24 A. Not off the top of my head do I 25 personally know somebody or can think that I</p>	<p style="text-align: right;">Page 156</p> <p>1 Q. Who is that judge?</p> <p>2 A. That was Judge Joy Oldfield.</p> <p>3 Q. That didn't answer my question at 4 all.</p> <p>5 A. To answer your question, I do not -- 6 I cannot, off the top of my head, personally 7 think of somebody in that situation.</p> <p>8 Q. That wasn't my question either. I 9 already asked that question and you said you 10 couldn't name anyone.</p> <p>11 The question I just asked was, have 12 you undertaken to determine the percentage of 13 people who are in the criminal justice system 14 because they were convicted of a drug crime who 15 used prescription opioids, developed an 16 addiction to opioids, then used illicit opioids 17 and were then arrested and prosecuted because of 18 a drug crime involving opioids?</p> <p>19 MR. PENDELL: Objection to form.</p> <p>20 MR. ARNOLD: Objection to form.</p> <p>21 Q. Have you undertaken to do that?</p> <p>22 MR. PENDELL: Same objection.</p> <p>23 A. So your question is have I gone out 24 and surveyed all the prisoners in the jail to 25 ask them if they started out on prescription</p>
<p style="text-align: right;">Page 155</p> <p>1 personally know somebody in that situation.</p> <p>2 Q. Have you undertaken to determine the 3 percentage of people who were convicted of a 4 drug crime who used prescription opioids, 5 developed an addiction, then used illicit 6 opioids and then were charged with and convicted 7 of a drug crime because of their use of illicit 8 opioids?</p> <p>9 MR. PENDELL: Objection.</p> <p>10 A. So, to me, these are interesting 11 questions as a -- personal questions as a 12 representative of Summit County. I personally 13 cannot think of anybody in that situation, but 14 as I have talked with people that -- in the 15 county that deal with people in that situation, 16 the first person I'm thinking about is one of 17 the judges who runs the Turning Point program, 18 who told me that 71 out of the 85 people who 19 participated in that last year were there 20 because of an opioid addiction, and that, yes, 21 it is quite common for people to -- to use a 22 prescription opiate and eventually end up on an 23 illegal opiate substance and in the criminal 24 justice system. So I have been told that 25 happens quite routinely.</p>	<p style="text-align: right;">Page 157</p> <p>1 opioids?</p> <p>2 Q. Have you done anything to undertake 3 that?</p> <p>4 A. I don't know that that's my role 5 with the county, to undertake something like 6 that.</p> <p>7 Q. Whether it's your role or not, have 8 you undertaken to do that?</p> <p>9 A. I have not.</p> <p>10 Q. Have you asked anyone else to do it?</p> <p>11 A. I have not.</p> <p>12 Q. To your knowledge, has anyone else 13 at Summit County studied that?</p> <p>14 A. I do not know.</p> <p>15 Q. Did the -- in 2018 did the ADM Board 16 create any new positions because of the opioid 17 problem?</p> <p>18 A. In the 2019 -- 2019 budget, the ADM 19 Board has requested an additional position. I 20 do not know offhand if that is specifically 21 related to the opiate issue or not.</p> <p>22 Q. What is the new position it's 23 requested?</p> <p>24 A. I don't recall. I just recall that 25 they were going from 20 employees to 21</p>

<p style="text-align: right;">Page 158</p> <p>1 full-time employees.</p> <p>2 Q. Has that request been granted?</p> <p>3 A. Yes.</p> <p>4 Q. How about in 2018; did the ADM Board</p> <p>5 create any new position because of the opioid</p> <p>6 problem in Summit County?</p> <p>7 A. They did not, but let's not forget</p> <p>8 the ADM Board is essentially a contracting</p> <p>9 entity that essentially -- when it comes to</p> <p>10 service providers, when it comes to addiction</p> <p>11 treatment and all of those services, it's the</p> <p>12 non-profits who contract with ADM who have added</p> <p>13 positions and requested additional dollars to</p> <p>14 deal with the opioid epidemic, not the ADM Board</p> <p>15 itself.</p> <p>16 Q. In 2018 did the ADM Board create any</p> <p>17 new position because of the opioid problem in</p> <p>18 Summit County?</p> <p>19 A. They did not.</p> <p>20 Q. How about in 2017?</p> <p>21 A. They did not.</p> <p>22 Q. 2016?</p> <p>23 A. I do not believe.</p> <p>24 Q. 2015?</p> <p>25 A. I do not believe.</p>	<p style="text-align: right;">Page 160</p> <p>1 A. That's correct.</p> <p>2 Q. How about 2016?</p> <p>3 A. No, they did not.</p> <p>4 Q. 2015?</p> <p>5 A. They did not.</p> <p>6 Q. 2014?</p> <p>7 A. They did not. And before that I</p> <p>8 would have to say I don't recall.</p> <p>9 Q. 2013?</p> <p>10 A. Don't recall.</p> <p>11 Q. How many new positions did the</p> <p>12 prosecutor's office create in 2018 because of</p> <p>13 the opioid problem?</p> <p>14 A. So with the prosecutor's office, you</p> <p>15 are talking about a -- an office that is</p> <p>16 restricted in funding because of the general</p> <p>17 fund restrictions on it and lack of funding for</p> <p>18 it. I don't believe they added any positions in</p> <p>19 2018.</p> <p>20 Q. So did the prosecutor's office</p> <p>21 create any new positions in 2018 because of the</p> <p>22 opioid problem?</p> <p>23 A. I do not believe so.</p> <p>24 Q. How about in 2017?</p> <p>25 A. I don't believe so.</p>
<p style="text-align: right;">Page 159</p> <p>1 Q. 2014?</p> <p>2 A. I do not believe.</p> <p>3 Q. 2013?</p> <p>4 A. I don't recall that far back.</p> <p>5 Q. In 2018 did the Children Services</p> <p>6 Board create any new position because of the</p> <p>7 opioid problem?</p> <p>8 A. The Children Services Board, in</p> <p>9 their 2019 budget request, has requested five</p> <p>10 additional staffing positions for case managers.</p> <p>11 Q. What is the status of that request?</p> <p>12 A. It was approved as part of their</p> <p>13 budget, and it was also part of their levy</p> <p>14 increase request back in November to fund those.</p> <p>15 Q. In 2018 did the Children Services</p> <p>16 Board create any new positions because of the</p> <p>17 opioid problem?</p> <p>18 A. They did not. I think the</p> <p>19 additional placement costs were consuming the</p> <p>20 vast majority of any excess dollars they had.</p> <p>21 Q. In 2017 did the Children Services</p> <p>22 Board create any new positions because of the</p> <p>23 opioid problem?</p> <p>24 A. Same answer.</p> <p>25 Q. The answer is no, they did not?</p>	<p style="text-align: right;">Page 161</p> <p>1 Q. How about 2016?</p> <p>2 A. If we start getting back there, I</p> <p>3 don't recall, because they also have a number of</p> <p>4 grants that they receive.</p> <p>5 Q. How about in 2015?</p> <p>6 A. I don't recall.</p> <p>7 Q. How about 2014?</p> <p>8 A. I don't recall either.</p> <p>9 Q. How about 2013?</p> <p>10 A. I don't recall.</p> <p>11 Q. Public defender's office; in 2018</p> <p>12 did the public defender's office create any new</p> <p>13 positions because of the opioid problem?</p> <p>14 A. The public defender's office is not</p> <p>15 a county agency. They're a private non-profit,</p> <p>16 so I have no way -- I do not know.</p> <p>17 Q. Did the court of common pleas create</p> <p>18 any new positions in 2018 because of the opioid</p> <p>19 problem?</p> <p>20 A. The court of common pleas has in</p> <p>21 2018 added additional probation officers.</p> <p>22 Q. How many?</p> <p>23 A. I'm going to say about eight.</p> <p>24 Q. And to be clear, are you saying they</p> <p>25 created eight new positions for probation</p>

<p style="text-align: right;">Page 162</p> <p>1 officers or they filled slots?</p> <p>2 A. They created eight new positions for</p> <p>3 probation officers.</p> <p>4 Q. In 2018?</p> <p>5 A. In late 2017, into early 2018, so</p> <p>6 part of this, and the funding for this was part</p> <p>7 of the initiative by the State of Ohio, because</p> <p>8 of overcrowding in the state's prison system, to</p> <p>9 essentially say we don't want non-violent, low</p> <p>10 level, felony 5 offenders, and that's where the</p> <p>11 big increase -- because those are primarily the</p> <p>12 drug possession cases. That's where the big</p> <p>13 increase occurred in both the local and state</p> <p>14 prisons. It's where the increase occurred in</p> <p>15 our public defense costs. The State of Ohio</p> <p>16 essentially said we won't accept prisoners</p> <p>17 sentenced to state prison anymore for those</p> <p>18 offenses and began a program called TCAP, which</p> <p>19 is Targeted Community Alternatives to Prison, to</p> <p>20 push low-level offenders back to the county</p> <p>21 level for alternative sentencing solutions.</p> <p>22 And so we -- and they provided grant</p> <p>23 money to do that. We at local level then ended</p> <p>24 up hiring -- one of the main offshoots of that</p> <p>25 were the additional eight positions hired at the</p>	<p style="text-align: right;">Page 164</p> <p>1 judges to the common pleas benches in Summit</p> <p>2 County, going from eight to ten, and staffing</p> <p>3 for those, to deal with increases in crime.</p> <p>4 That may have been even prior to 2013.</p> <p>5 Q. Can you place that in time?</p> <p>6 A. Offhand, I don't recall. Probably</p> <p>7 mid to late 2000s.</p> <p>8 Q. So you believe that the two</p> <p>9 additional judges, plus the staffing to assist</p> <p>10 those judges, was sometime before 2010?</p> <p>11 MR. PENDELL: Objection to form.</p> <p>12 A. I believe.</p> <p>13 Q. And sitting here today, your</p> <p>14 understanding is that the court of common pleas</p> <p>15 did not create any new positions because of the</p> <p>16 opioid problem between 2013 and 2017, correct?</p> <p>17 A. I have to think about -- they have</p> <p>18 added one or two positions in the court</p> <p>19 operations itself. One of -- I believe one of</p> <p>20 those positions may have been in the</p> <p>21 psycho-diagnostic -- a psycho-diagnostic</p> <p>22 evaluator, which isn't -- I'm going to say is</p> <p>23 not completely opioid related but certainly has</p> <p>24 strong ties into the opiate situation.</p> <p>25 Q. When was the psycho-diagnostic</p>
<p style="text-align: right;">Page 163</p> <p>1 adult probation department.</p> <p>2 The State of Ohio is also looking at</p> <p>3 sentencing -- and this is what led to State</p> <p>4 Issue 1 last year, to reform sentencing for</p> <p>5 these drug possession offenders because there</p> <p>6 are so many of them in the system who, once they</p> <p>7 get a felony conviction, can't get work anymore;</p> <p>8 that they are looking at alternative treatment</p> <p>9 programs and trying to essentially decriminalize</p> <p>10 a lot of the drug possession -- and all of this</p> <p>11 is a result of what's happened over the last</p> <p>12 several years with this opiate.</p> <p>13 Q. In 2017 did the court of common</p> <p>14 pleas create any new positions because of the</p> <p>15 opioid problem?</p> <p>16 A. They did not.</p> <p>17 Q. How about in 2016?</p> <p>18 A. They did not.</p> <p>19 Q. How about 2015?</p> <p>20 A. I don't believe.</p> <p>21 Q. How about 2014?</p> <p>22 A. I don't believe. Now --</p> <p>23 Q. How about 2013?</p> <p>24 A. -- somewhere -- and I don't recall</p> <p>25 what year this was -- we did add two additional</p>	<p style="text-align: right;">Page 165</p> <p>1 evaluator position created?</p> <p>2 A. I think that was somewhere around</p> <p>3 2015, '14. I'm not completely sure on that,</p> <p>4 though, without going back to look.</p> <p>5 Q. Turning your attention to the eight</p> <p>6 new probation officer positions created by the</p> <p>7 court of common pleas in 2018, you said that was</p> <p>8 the result of overcrowding as a result of the</p> <p>9 state system not accepting prisoners?</p> <p>10 A. Correct.</p> <p>11 Q. And how did Summit County pay for</p> <p>12 these new -- eight new probation officer</p> <p>13 positions, using what funds?</p> <p>14 A. Grant funds provided by the state.</p> <p>15 Q. Entirely?</p> <p>16 A. Yes.</p> <p>17 Q. Turning your attention to the</p> <p>18 juvenile court, how many positions, if any, did</p> <p>19 the juvenile court create in 2018 because of the</p> <p>20 opioid problem?</p> <p>21 A. Juvenile court is a little different</p> <p>22 in the way that they operate. The judge at our</p> <p>23 juvenile court has a strong belief in</p> <p>24 alternative programming, so they tend not to</p> <p>25 hold very many kids in detention.</p>

<p style="text-align: right;">Page 166</p> <p>1 The biggest cost driver at the</p> <p>2 juvenile court is the significant increase in</p> <p>3 indigent defense costs related to those cases at</p> <p>4 the court. I do not believe -- well, they have</p> <p>5 added -- they have added some staff over the</p> <p>6 years through some alternative programming in</p> <p>7 their CASA GAL program. I don't know. I don't</p> <p>8 have specific numbers for specific years on</p> <p>9 them. I don't recall anything in the last two</p> <p>10 or three years that they've added.</p> <p>11 Q. Okay. Did the juvenile court create</p> <p>12 any new positions in 2018 because of the opioid</p> <p>13 problem?</p> <p>14 A. I don't believe so.</p> <p>15 Q. How about 2017?</p> <p>16 A. I don't believe so.</p> <p>17 Q. How about 2016?</p> <p>18 A. I don't believe so.</p> <p>19 Q. How about 2015?</p> <p>20 A. I don't recall.</p> <p>21 Q. How about 2014?</p> <p>22 A. Don't recall.</p> <p>23 Q. How about 2013?</p> <p>24 A. Don't recall.</p> <p>25 Q. Sheriff's office --</p>	<p style="text-align: right;">Page 168</p> <p>1 eliminated several years ago. The -- we have</p> <p>2 also, over the last several years, double-bunked</p> <p>3 most of the jail to hold inmates as a result of</p> <p>4 the increase in the number of felony 5 offenders</p> <p>5 sitting at the jail.</p> <p>6 Q. Okay, sir. My question was very</p> <p>7 specific. How many positions, if any, did the</p> <p>8 sheriff's office create in 2018 because of the</p> <p>9 opioid problem?</p> <p>10 MR. PENDELL: Objection to form.</p> <p>11 A. I never did finish answering. So</p> <p>12 the reality is they're adding five, they've</p> <p>13 realigned 16 to come back to the jail, and</p> <p>14 they've requested 60.</p> <p>15 Q. So how many new positions are there?</p> <p>16 A. Five.</p> <p>17 Q. Okay. And what will these</p> <p>18 additional inmate service workers do?</p> <p>19 A. Provide recreation -- primarily</p> <p>20 recreation programming, AA and NA, which are the</p> <p>21 alcohol and drug programming services, and</p> <p>22 religious services at the jail to deal with the</p> <p>23 larger inmate population at the jail.</p> <p>24 Q. And so did the sheriff's office get</p> <p>25 these five additional inmate service workers</p>
<p style="text-align: right;">Page 167</p> <p>1 A. Yes.</p> <p>2 Q. -- in 2018 how many, if any, new</p> <p>3 positions did the sheriff's office create</p> <p>4 because of the opioid problem?</p> <p>5 A. Well, so the sheriff's office came</p> <p>6 to us in 2018 with a request to add 60</p> <p>7 additional deputies to his staff. That request</p> <p>8 was turned down. We do not have the funding for</p> <p>9 that. That request ultimately led to -- was one</p> <p>10 of the drivers that led to the formation of</p> <p>11 redesignating the Glenwood Jail operated by</p> <p>12 Oriana House as a community alternative</p> <p>13 sentencing center and not a county jail, which</p> <p>14 would allow for more folks who are being pushed</p> <p>15 through the prison system, particularly on these</p> <p>16 low-level, non-violent offenses, to go to</p> <p>17 this -- to the CASC and receive treatment</p> <p>18 services.</p> <p>19 The -- the result of that was also</p> <p>20 that we were able to pull 16 sheriff deputies</p> <p>21 back from what used to be the Glenwood Jail, add</p> <p>22 them to the staffing at the county jail, and</p> <p>23 then also approved hiring five -- five</p> <p>24 additional inmate service workers to help</p> <p>25 restore programming at the jail that was</p>	<p style="text-align: right;">Page 169</p> <p>1 because of the increased population at the</p> <p>2 county jail?</p> <p>3 A. Yes.</p> <p>4 Q. How many, if any, new positions did</p> <p>5 the sheriff's office create in 2017?</p> <p>6 A. As a result of the opioid epidemic?</p> <p>7 Q. Because of the opioid problem.</p> <p>8 A. The answer to that would be none.</p> <p>9 Q. How about 2016?</p> <p>10 A. None.</p> <p>11 Q. 2015?</p> <p>12 A. And I should clarify. All of these</p> <p>13 years they've requested additional staffing and</p> <p>14 gotten none because of a lack of funding.</p> <p>15 Q. Okay. So how many -- to be clear,</p> <p>16 in 2017 and 2016 the sheriff's office did not</p> <p>17 create any new positions because of the opioid</p> <p>18 problem, correct?</p> <p>19 A. They requested two and were denied.</p> <p>20 Q. Okay. Requested two in 2017?</p> <p>21 A. Yep.</p> <p>22 Q. And requested two in 2016?</p> <p>23 A. Yep.</p> <p>24 Q. And both were denied?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 170</p> <p>1 Q. How many, if any, new positions were 2 created by the sheriff's office in 2015? 3 A. They requested in '15 and were 4 denied. 5 Q. How many did they request in 2015? 6 A. I think the number then was right 7 around 24 to 26. 8 Q. How many, if any, new positions were 9 created by the sheriff's office in 2014 because 10 of the opioid problem? 11 A. 24 to 26. 12 Q. Were requested? 13 A. Yes. 14 Q. How many were granted? 15 A. None. 16 Q. How many, if any, new positions were 17 created by the sheriff's office in 2013 because 18 of the opioid problem? 19 A. Again, requested 24 to 26, and none 20 were granted. 21 Q. So is it accurate to say that from 22 2013 to 2017, the sheriff's office did not 23 create any new positions because of the opioid 24 problem? 25 A. It is accurate --</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. And in 2018 the sheriff's office 2 added five inmate service workers because of the 3 opioid problem? 4 A. Yes. 5 Q. And that's because of the additional 6 inmate population at the county jail, correct? 7 A. Yes. 8 Q. Which is due to the state refusing 9 to accept inmates at state-run facilities? 10 MR. PENDELL: Objection to form. 11 A. Not completely. The jail inmate 12 population has risen steadily over the last two 13 or three years, even prior to the state action. 14 The creation of the CASC and more people being 15 sent out of the jail to the former Glenwood 16 Jail, the now CASC run by Oriana, that increase 17 is truly a direct result, along with the 18 additional probation officers, of the state 19 refusing to accept felony 5 non-violent 20 offenders. 21 Q. What funds is Summit County using to 22 pay for these five additional inmate service 23 workers? 24 A. County general fund dollars. 25 Q. I had asked you before about the</p>
<p style="text-align: right;">Page 171</p> <p>1 MR. PENDELL: Objection. 2 A. -- to say they did not create any 3 new positions because of a lack of funding, but 4 the need was there because of the opiate 5 problem. 6 Q. But if we're trying to figure out 7 dollars that were spent, no new positions were 8 created between 2013 and 2017 because of the 9 opioid problem, correct? 10 A. If we're going to start talking 11 about dollars that were spent, we also had an 12 increase in overtime costs at the jail during 13 that period. 14 Q. Sir, this is -- you can give your 15 testimony down the road. Today -- and I think 16 I've been quite tolerant -- I'm asking you to 17 answer the question I pose. So is it accurate 18 to say that between 2013 and 2017, the sheriff's 19 office did not create any new positions because 20 of the opioid problem? Is that accurate? 21 MR. PENDELL: Objection. Form. 22 Asked and answered. 23 A. It is accurate to say the sheriff's 24 office did not receive funding for any new 25 positions during that period.</p>	<p style="text-align: right;">Page 173</p> <p>1 sheriff's office. If we talk about the sheriff 2 jail category, would you have anything different 3 to say about whether any new positions were 4 created? 5 A. No. It's all the same answers. 6 Yeah. 7 Q. So you don't break it out by 8 sheriff's office and sheriff jail? 9 A. I mean, we have a budget for sheriff 10 admin, sheriff jail. When you and I are talking 11 about sheriff operations, I'm thinking of the 12 whole big -- 13 Q. So taking sheriff office admin and 14 sheriff jail, the only new positions that were 15 created since 2013 because of the opioid problem 16 are these five additional inmate service 17 workers? 18 A. Yeah. They were the only positions 19 funded. 20 Q. Now, turning to alternative 21 corrections -- 22 A. Okay. 23 Q. -- what is that? 24 A. Alternative corrections is the 25 Oriana House.</p>

<p style="text-align: right;">Page 174</p> <p>1 Q. What new positions did Oriana House 2 create in 2018 because of the opioid problem? 3 A. So Oriana is a private, 4 not-for-profit entity. I don't have an answer 5 for that. I will tell you that as a result of 6 the formation of the CASC, we have increased 7 their budget by a total of -- I think starting 8 this year, with the new operation of the CASC, 9 by a total of about \$760,000, to provide for 10 additional employees and additional programming 11 at that facility. 12 Q. Okay. Are you able to tell me for 13 any year between 2013 and 2018 whether or how 14 many new positions were created by Oriana House 15 because of the opioid problem? 16 A. I cannot. I don't have any of that 17 information available. 18 Q. And does Oriana House get funding 19 from Summit County to provide incarceration 20 services? 21 A. They get -- they get funding to 22 provide incarceration services, drug and alcohol 23 treatment programs, home monitoring services, a 24 whole host of what we would call alternative 25 sentencing options.</p>	<p style="text-align: right;">Page 176</p> <p>1 A. Again, with public health, they're a 2 separate entity. I don't have their employment 3 information. 4 The other thing I will say about 5 adult probation, over the last several years, in 6 addition to those eight that the state has paid 7 for, they have, like the sheriff's office and 8 the prosecutor's office and other entities, 9 asked for funding for additional positions and 10 been denied because of the lack of available 11 funding. They also asked us for money to 12 increase the salary of probation officers this 13 year because of the caseloads and because they 14 felt they weren't competitive with what other 15 counties are paying, and they were denied that 16 request from local dollars as well. 17 - - - - - 18 (Thereupon, Nelsen 30(b)(6) 19 Deposition Exhibit 3, Summit County, 20 Ohio Plaintiff's Second Supplemental 21 Response and Objections to 22 Distributor Defendants' 23 Interrogatory No. 18 Pursuant to the 24 Court's November 21, 2018 Order, was 25 marked for purposes of</p>
<p style="text-align: right;">Page 175</p> <p>1 Q. Then turning your attention to adult 2 probation -- 3 A. Yes. We did talk about that. 4 That's part of common pleas court. 5 Q. So you grouped that together? 6 A. Yes, I did. 7 Q. So talking about the court of common 8 pleas and adult probation, the only new 9 positions that were created since 2013 are the 10 eight new probation officer positions? 11 A. Yes. 12 Q. Those were created in 2018, and 13 those are funded by the state entirely? 14 A. Those new positions, yes. 15 And then there was also that 16 evaluator position, I believe, at the court. 17 Q. Right, which -- the 18 psycho-diagnostic evaluator position? 19 A. Yes. 20 Q. And you placed that sometime in 2014 21 or 2015? 22 A. Somewhere in that range, yeah. 23 Q. How about public health? Has public 24 health created any new positions because of the 25 opioid problem since 2013?</p>	<p style="text-align: right;">Page 177</p> <p>1 identification.) 2 - - - - - 3 (Thereupon, Nelsen 30(b)(6) 4 Deposition Exhibit 4, Spreadsheet 5 Entitled "Summit County (\$ 6 Millions)," Marked Confidential, was 7 marked for purposes of 8 identification.) 9 - - - - - 10 Q. I'm showing you what has been marked 11 as Nelsen 30(b)(6) Exhibit 3 and what I've 12 marked as Nelsen 30(b)(6) number 4. These two 13 documents were previously marked as Nelsen 14 Exhibit 2 and 3 in your December deposition. 15 Do you have those two documents in 16 front of you? 17 A. Yes. 18 Q. I asked you questions about the 19 chart that is Nelsen 30(b)(6) Exhibit 4 in your 20 deposition in December. 21 Do you recall that? 22 A. Yes. 23 Q. And you testified that you did not 24 prepare this chart, correct? 25 A. That's correct.</p>